Section 1. Registration Information

Source Identification

Facility Name:	DuPont Pennsauken Plant
Parent Company #1 Name:	DDP Specialty Electronics Materials US, Inc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	16-Oct-2019
Postmark Date:	16-Oct-2019
Next Due Date:	16-Oct-2024
Completeness Check Date:	16-Oct-2019
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0018 6764
Other EPA Systems Facility ID:	08110CLTXC1500J
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	92857929
Parent Company #1 DUNS:	1381581
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	1500 John Tipton Blvd
Street 2:	
City:	Pennsauken
State:	NEW JERSEY
ZIP:	08110
ZIP4:	
County:	CAMDEN

Facility Latitude and Longitude

Latitude (decimal):	39.982667
Longitude (decimal):	-075.040611
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	DDP Speciality Electronics Material
Operator Phone:	(856) 910-4900

Mailing Address

Operator Street 1:	1500 John Tipton Blvd.
Operator Street 2:	
Operator City:	Pennsauken
Operator State:	NEW JERSEY
Operator ZIP:	08110
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Rob Buchler
RMP Title of Person or Position:	Site Leader
RMP E-mail Address:	robert.buchler@dupont.com

Emergency Contact

Emergency Contact Name:	Rob Buchler
Emergency Contact Title:	Site Leader
Emergency Contact Phone:	(856) 910-4901
Emergency Contact 24-Hour Phone:	(215) 478-5480
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	robert.buchler@dupont.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(856) 910-4900
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Pennsauken Township OEM

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	40
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	
CAA Title V:	Yes

Air Operating Permit ID:	BOP180001

OSHA Ranking

OSHA Star or Merit Ranking:	

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	28-Aug-2018
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	Edward Kaminski
Preparer Phone:	(856) 910-4906
Preparer Street 1:	1500 John Tipton BLVD
Preparer Street 2:	
Preparer City:	Pennsauken
Preparer State:	NEW JERSEY
Preparer ZIP:	08110
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000103814
Description:	1
Process Chemical ID:	1000129981
Program Level:	Program Level 3 process
Chemical Name:	Flammable Mixture
CAS Number:	00-11-11
Quantity (lbs):	120000
CBI Claimed:	
Flammable/Toxic:	Flammable

Flammable Mixture Chemical Components

Flammable Mixture Chemical ID:	1000114065
Chemical Name:	Pentane
CAS Number:	109-66-0
Flammable/Toxic:	Flammable

Flammable Mixture Chemical ID:	1000114066
Chemical Name:	Isopentane [Butane, 2-methyl-]
CAS Number:	78-78-4
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000103814
Process NAICS ID:	1000105146
Program Level:	Program Level 3 process
NAICS Code:	32615
NAICS Description:	Urethane and Other Foam Product (except Polystyrene) Manufacturing

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000062162

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	Diked containment area

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000058338

Model Used:	EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Enclosures:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	Yes
Deluge System:	Yes
Water Curtain:	
Excess Flow Valve:	
Other Type:	Foam Suppression (for Storage Tank and Containment Pit)

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

Pentane Facility

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000109399
Chemical Name:	Flammable Mixture
Flammable/Toxic:	Flammable
CAS Number:	00-11-11

Process ID:	1000103814
Description:	1
Prevention Program Level 3 ID:	1000087799
NAICS Code:	32615

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	22-Dec-2016

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	22-Dec-2016

The Technique Used

What If:	
Checklist:	Yes
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2019

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	

Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	Yes
Purge System:	
None:	
Other Process Control in Use:	Air Stripper, Carbon Beds

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Foam Suppression (for the Storage Tank and Containment Pit)

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	

Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	Yes
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	03-Sep-2019

Training

Training Revision Date (The date of the most recent review or revision of training programs):	25-Feb-2019

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	Review panel

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	21-Feb-2018
Equipment Inspection Date (The date of the most recent equipment inspection or test):	17-Sep-2019
Equipment Tested (Equipment most recently inspected or tested):	V826A (Pentane Tote)

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	15-Feb-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	25-Jun-2018

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	30-Apr-2019

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	28-Aug-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	28-Feb-2019

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	19-Feb-2019
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	30-Apr-2019

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	30-Jul-2019

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	06-Mar-2019

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	13-Jul-2017
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	11-Oct-2019

Confidential Business Information

CBI Claimed:	

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	06-Mar-2019

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	25-Sep-2019

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Pennsauken Fire Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(856) 663-1313

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	TCPA at NJAC7:31-5.2

Executive Summary

Executive Summary for DuPont Pennsauken Plant

1. Accidental Release Prevention and Emergency Response Policies
We at Dupont Pennsauken Plant are strongly committed to employee, public and environmental safety. This commitment is demonstrated by our comprehensive accidental release prevention program that covers areas such as design, installation, operating procedures, maintenance, and employee training associated with the processes at our facility. It is our policy to implement appropriate controls to prevent possible releases of regulated substances.

2. The Stationary Source and the Regulated Substances Handled
Our facility's primary activities encompass manufacturing rigid polyurethane foam board insulation. A blowing agent is required to manufacture the foam board insulation. The blowing agent used (80% CYCLO / 20% ISOPENTANE BLEND) is regulated material.

3. The General Accidental Release Prevention Program and the Chemical-Specific Prevention Steps
Our facility has taken all the necessary steps to comply with the accidental release prevention requirements set out under 40 CFR Part 68 of the Environmental Protection Agency. Additionally, the facility was designed and constructed in accordance with NFPA-58 Standard, 1998 Edition. The following sections briefly describe the elements of the release prevention program that is in place at our stationary source.

Process Safety Information
Dupont Pennsauken Plant maintains a detailed record of safety information that describes the chemical hazards, operating parameters and equipment designs associated with all processes.

Process Hazard Analysis
Our facility conducts comprehensive studies to ensure that hazards associated with our processes are identified and controlled. The checklist technique is used to complete these analyses. The studies are undertaken by a team of qualified personnel with expertise in engineering and process operations and are revalidated at a regular intervals meeting or exceeding the required 5 year frequency. Any findings related to the hazard analysis are addressed in a timely manner.

Operating Procedures
For the purposes of safely conducting activities within our covered processes, DuPont Pennsauken Plant maintains written operating procedures. These procedures address various modes of operation such as initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown and startup after a turnaround. The information is regularly reviewed and is readily accessible to operators involved in the processes.

Training
DuPont Pennsauken Plant has a comprehensive training program in place to ensure that employees who are operating processes are competent in the operating procedures associated with these processes. Refresher training is provided at least every year and more frequently as needed.

Mechanical Integrity
DuPont Pennsauken Plant carries out highly documented maintenance checks on process equipment to ensure proper operations. Process equipment examined by these checks includes among others; pressure vessels, storage tanks, piping systems, relief and vent systems, emergency shutdown systems, controls and pumps. Maintenance operations are carried out by qualified personnel with previous training in maintenance practices. Furthermore, these personnel are offered specialized training as needed. Any equipment deficiencies identified by the maintenance checks are corrected in a safe and timely manner.

Management of Change
Written procedures are in place at the DuPont Pennsauken Plant to manage changes in process chemicals, technology, equipment and procedures. Process operators, maintenance personnel or any

other employee whose job tasks are affected by modifications in process conditions will be promptly notified of the modification and will be offered the appropriate training.

Pre-startup Reviews

Pre-start up safety reviews related to new processes and to modifications in established processes are conducted at the Dupont Pennsauken Plant per DuPont policy. A safety review will be conducted prior to start-up. The review will be constructed to confirm that construction, equipment, operating and maintenance procedures are suitable for safe startup prior to placing equipment into operation.

Compliance Audits

The Dupont Pennsauken Plant conducts audits on an annual basis to determine whether the provisions set out under the RMP rule are being implemented. Any corrective actions required as a result of the audits are undertaken in a safe and prompt manner.

Incident Investigation

The DuPont Pennsauken Plant promptly investigates any incident that has resulted in, or could reasonably result in a catastrophic release of a regulated substance. These investigations are undertaken to identify the situation leading to the incident as well as any corrective actions to prevent the release from reoccurring. All reports are retained for a minimum of 5 years.

Employee Participation

The DuPont Pennsauken Plant truly believes that process safety management and accident prevention is a team effort. Company employees are strongly encouraged to express their views concerning accident prevention issues and to recommend improvements. In addition, our employees have access to all information created as part of the facility's implementation of the RMP rule, including information resulting from process hazard analyses in particular.

Contractors

On occasion, our company hires contractors to conduct specialized maintenance and construction activities. Prior to selecting a contractor, a thorough evaluation of safety performance of the contractor is carried out. The Dupont Pennsauken Plant has a strict policy of informing the contractors of known potential hazards related the contractor's work and the processes. Contractors are also informed of all the procedures for emergency response should an accidental release of a regulated substance occur.

Planned Changes to Improve Safety

Currently, there are no changes planned to improve facility safety. However, equipment and facility safety inspections and process hazard analyses (PHA) are completed periodically to ensure that facility safety is not compromised. All inspection findings and PHAs are reviewed and addressed in a timely manner.

4. Five-year Accident History

DuPont Pennsauken Plant has had an excellent record of preventing accidental releases over the last 5 years. Due to our stringent release prevention policies, there has been no accidental release during this period.

5. Emergency Response Plan

The Dupont Pennsauken Plant carries a written emergency response plan to deal with accidental releases of hazardous materials. The plan includes all aspects of emergency response including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas.

To ensure proper functioning, our emergency response equipment is regularly inspected and serviced. In addition, the plan is promptly updated to reflect any pertinent changes taking place within our processes that would require a modified emergency response.

Pennsauken Township OEM is the Local Emergency Planning Committee (LEPC) with which our emergency plan has been coordinated and verified.